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May 17, 2024

Honorable Michael A. Shipp, U.S.D.J.
United States District Court
Clarkson S. Fisher Building & US Courthouse
402 East State Street
Trenton, NJ 08608

Honorable Rukhsanah L. Singh, U.S.M.J
United States District Court
Clarkson S. Fisher Building & US Courthouse
402 East State Street
Trenton, NJ 08608

Re: Johnson & Johnson Talcum Powder Products, Marketing, Sales Practices and Products Liability Litigation
Case No.: 3:16-md-02738-MAS-RLS

Dear Judge Shipp and Judge Singh:

We write to advise the Court of a newly published peer-reviewed article published in the Journal of Clinical Oncology relevant to the pending matters. The article is the peer-reviewed work of Katie M. O'Brien, et al. entitled, "Intimate Care Products and Incidence of Hormone-Related Cancers: A Quantitative Bias Analysis," J. Clin. Oncol. 00:1-15; 2024 (attached as Exhibit A).

The study findings confirm and reaffirm the general causation opinions of those plaintiffs' general causation experts whose reports and testimony were the subject of the *Daubert* challenges conducted before this Court in 2019. The authors conclude that there is a positive association between the genital use of talcum powder

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and ovarian cancer: “Our findings of a positive association between genital talc use and ovarian cancer are consistent with previous studies.” p. 13.

Moreover, the study’s results confirm that there is higher positive association between genital talc use and ovarian cancer for frequent and long-term users. (*Id.*) The study’s findings are consistent with and affirmative of the peer-reviewed medical and scientific literature published since the Court’s *Daubert* opinion issued on April 27, 2020. Moreover, Dr. O’Brien and her co-authors’ opinions as expressed in the study are consistent with the November 2023 supplemental reports of plaintiffs’ general causation experts.

Respectfully submitted,

/s/ P. Leigh O'Dell

P. Leigh O'Dell

/s/ Michelle A. Parfitt

Michelle A. Parfitt

cc: Hon. Joel Schneider, U.S.M.J. (ret.) (via email)
Susan Sharko, Esq. (via email)
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